

1 IN THE UNITED STATES DISTRICT COURT FOR
2 THE EASTERN DISTRICT OF PENNSYLVANIA

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5 JOSEPH SIMMONS, :
6 Plaintiff, :
7 vs. : CIVIL ACTION
8 CITY OF PHILADELPHIA, : NO. 22-1644-JMG
9 et al., :
10 Defendants. :

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14 The video conference deposition of
15 JESSIE WILSON, on Tuesday, February 11, 2025,
16 commencing at 10:03 a.m. before Natalie J. Goldhill,
17 a Professional Reporter and a Notary Public in and
18 for the Commonwealth of Pennsylvania.

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23 Everest Job No. 37796
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1 but he didn't go into detail.

2 Q. Okay. When you're looking at him,
3 could you observe any physical injuries on him?

4 A. I don't remember. I can't remember.

5 Q. So how long does this conversation
6 last?

7 A. About a good maybe five, almost ten
8 minutes.

9 Q. Okay. Does he share any other details
10 with you about what happened?

11 A. No, not that I can recall.

12 Q. Do you remember who his cellmate was?

13 A. The name, no.

14 Q. Okay. Do you have any recollection
15 about his cellmate and whether his cellmate had any
16 history of fighting or disciplinary issues prior to
17 that?

18 A. No.

19 Q. Okay. So you call Sergeant Thomas or
20 you notify him. What do you tell Sergeant Thomas?

21 A. Sergeant Thomas is the center control
22 target for that evening, the 11 to 7 shift. I
23 notified him.

24 He told me to notify the supervisor
25 for that area, which is I believe the other

1 sergeant. I informed Sergeant Thomas that I have an
2 inmate who is stating he doesn't want to be in the
3 cell. He had a verbal altercation that became
4 physical and he states he doesn't feel safe.

5 Q. Okay. What did Sergeant Thomas say?

6 A. I believe Sergeant Thomas told me to
7 notify your area supervisor. At the time, I didn't
8 know who it was. So that's why I guess he gave me
9 who the supervisor was for that area. That's when
10 the sergeant called or I called in on the log.

11 Q. Okay. So Sergeant Campbell calls you.
12 What do you tell Sergeant Campbell?

13 A. Same thing. I have an inmate in Cell
14 8 who just had a fight. He's stating they had a
15 verbal altercation that became physical and he
16 doesn't feel safe and he wants to be moved.

17 Q. All right. What does Sergeant
18 Campbell respond?

19 A. I believe he stated he would be there
20 to talk to the inmates, talk to the inmates.

21 Q. Okay. When he says he would be there,
22 was it your expectation that he was coming right
23 down?

24 A. Yes.

25 Q. I'll pull the log back up for you.

1 This call with Sergeant Campbell when he said he
2 would be there, that happened at 23:38?

3 A. Yeah. He called the pod.

4 Q. Okay. Before you signed off 20
5 minutes after midnight, did Sergeant Campbell ever
6 come down to the pod?

7 A. I don't think so, no.

8 Q. Okay. You have another call at 23:59
9 with Lieutenant Crawford. Do you remember what was
10 said in that conversation?

11 A. Yes, same thing. I informed him. He
12 wanted to know what was going on. I believe he knew
13 about Inmate Simmons. Mr. Simmons had kind of some
14 type of rapport with him in the past.

15 So I guess he was calling to ask, you
16 know, hey, man, what's going on. I informed him
17 that he got into a fight, he claims he doesn't feel
18 safe in the cell, and wants to be moved.

19 Q. Okay. What did Lieutenant Crawford
20 respond, if anything?

21 A. He said he'll come down and talk to
22 him sometime that night, as well.

23 Q. Okay. But as far as you can recall,
24 he didn't come down before you signed off?

25 A. No.

1 Q. During this time period while you're
2 talking to Thomas and Campbell and Crawford up until
3 you sign off, are you hearing anything at all coming
4 from Joseph Simmons' cell?

5 A. Yes. He's still continuing to hit the
6 button and saying, hey, man, I got to get out of
7 here, I keep fighting my cellmate.

8 Q. Okay. So he was pretty adamant that
9 he had to get out of that cell?

10 ATTORNEY FARIS: Objection. You can
11 answer.

12 THE WITNESS: Yes.
13 BY ATTORNEY COYLE:

14 Q. Did he ever indicate to you to not
15 leave him alone in the cell?

16 A. That, I don't remember.

17 Q. When Officer Holmes came on to relieve
18 you, did you inform him about the issues going on in
19 Cell 8?

20 A. Yes, I informed him.

21 Q. Okay. What did you tell him?

22 A. I told him that Cell 8, they're having
23 some issues, they're fighting inside the cell, and
24 that one of the inmates wanted to be removed. I
25 informed him that I notified the proper chain of